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12 Attorneys for SLF Fire Victim Claimants
and certain Tubbs Preference Plaintiffs
13

14 UNITED STATES BANKRUPTCY COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 In re
17 PG&E CORPORATION and
18 PACIFIC GAS AND ELECTRIC
COMPANY,

19 Debtors.

20 ☐ Affects PG&E Corporation
21 ☐ Affects Pacific Gas and Electric Company
22 ☒ Affects both Debtors
23 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM)
24
25
26

) Bankruptcy Case
) No. 19-30088 (DM)
) Chapter 11
) (Lead Case)
) (Jointly Administered)
)

**JOINDER OF CERTAIN TUBBS
PREFERENCE PLAINTIFFS IN
SUPPORT OF RESPONSE TO
OBJECTIONS TO TERMS OF
TUBBS SETTLEMENT
DOCUMENTS
[Dkt. ## 5282, 5284, 5459, and 5497]**

) Date: January 29, 2020
) Time: 10:00 a.m.
) Place: United States Bankruptcy Court
) Courtroom 17, 16th Floor
) San Francisco, CA 94102
)

27 TO THE COURT, ALL PARTIES, AND ALL ATTORNEYS OF RECORD
28

1 The Singleton Law Firm, APC (“SLF”), Marshack Hays, LLP, and their co-counsel represent
2 approximately 7,000 victims of the 2015 Butte Fire, the 2017 North Bay Fires, and the 2018 Camp
3 Fire. SLF represented the following preference plaintiffs in the Tubbs Cases -- Evelyn Venturi and
4 Teresa Venturi-Hentz, as power of attorney for Evelyn Venturi and Trustee of and the Edward
5 Venturi and Evelyn Venturi Family Trust, Thomas Howard, Jacqueline Tihoni, and The Tom and JT
6 Howard 2003 Revocable Trust, Barbara Spangler, Individually and as Trustee of the Barbara A.
7 Spangler Trust, Glenda Samson, Donald Maffioli and Catherine Maffioli (collectively, the “Tubbs
8 Preference Plaintiffs”) -- the settlement of which is the subject of Debtors’ motion to approve the
9 settlement (Dkt. Nos. 5282 and 5284).

10 SLF approved the terms of and executed the the Restructuring Support Agreement between
11 the Debtor and the Tort Claimants (the “RSA”) that states in pertinent part at ¶ 2(h):

12 upon entry of the RSA Approval Order, the Debtors shall (i) have entered into one or
13 more settlement agreements settling all of the Tubbs Cases (the “**Tubbs Settlements**”),
14 which shall (A) allow such claims subject to payment solely from the Fire Victims
15 Trust (as defined in the Term Sheet and provided in the Amended Plan), (B) be in form
16 and substance satisfactory to the parties thereto, (C) **be confidential and sealed**, and
17 (D) not be admissible or introduced into evidence for any purpose in any proceeding,
including without limitation the Estimation Matters or in any other case or proceeding
in or related to the Chapter 11 Cases; and (ii) have filed a motion with the Bankruptcy
Court seeking approval of the Tubbs Settlements on shortened notice. [Emphasis
added.]

18 In addition, along with counsel for more than 70% of the Fire Victims, as well as by a
19 majority of the members of the TCC, SLF approved the terms of and executed the initial draft of the
20 PG&E Fire Victims Trust Agreement. The Trust states in pertinent part at Section 2.6:

21 [T]he amount of any Fire Victim Claim that is approved, accepted, or disallowed in
22 whole or in part shall not be disclosed to any person or entity other than to the Trustee,
23 the Claims Administrator, Claims Processor, the Neutrals, the Fire Victim, the Fire
Victim’s authorized agent, or to any court of competent jurisdiction, and, in the latter
case, only then in a document filed with the court under seal.

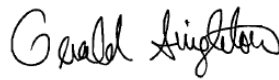
24 In addition to a number of still-pending cases from the 2015 Butte Fire, SLF represented and
25 settled cases on behalf of approximately 1,300 victims of the Butte Fire with the Debtor. In each of
26 these settlements from the 2015 Butte Fire, the settlement agreement and the amount to be paid was
27 confidential.

1 In order to maintain the right to privacy of our clients whose Tubbs Trial cases were settled,
2 in keeping with prior practice that has been approved and followed by earlier courts, and in
3 conformity with the provisions of the RSA and the PG&E Fire Victims Trust Agreement, SLF and
4 its co-counsel hereby join in the Response to the objection filed as Document No. 5459 and
5 respectfully requests that this Court maintain the confidentiality of the Tubbs Preference Plaintiffs'
6 right to privacy guaranteed by the California Constitution and their right to have the amount of
7 compensation that they receive as a result of the horrors they endured as a result of the PG&E
8 wildfires to be kept confidential and shared only as necessary to have their claim resolved.

9 DATED: January 24, 2020

Respectfully submitted,

10 SINGLETON LAW FIRM, APC

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12 By: _____
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